



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 28, 2023

BY ECF

The Honorable John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Aguilar & Perez*, 22 Cr. 669 (JPC)

Dear Judge Cronan:

The Government respectfully writes, with the consent of defense counsel, to request a 30-day adjournment of the parties' deadline to make expert disclosures in the above-referenced matter.

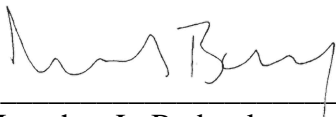
On December 16, 2022, during the parties' initial appearance before Your Honor, the Court set a deadline of January 31, 2023, for the Government's expert disclosures. On January 30, 2023, the Government requested an adjournment of that deadline, which the Court granted on January 31, 2023, setting a deadline of March 1, 2023 for all parties' expert disclosures.

The Government's process of identifying expert witnesses it may call to testify should this case proceed to trial remains ongoing. Moreover, the parties continue to be engaged in discussions regarding potential pretrial resolution of this matter. According, the Government respectfully requests, with the consent of defense counsel, that the parties' expert disclosure deadlines be adjourned an additional approximately 30 days. Given that, as before, no motion schedule or trial date has yet been set, the Government respectfully submits that the requested adjournment will not prejudice any party, nor unduly delay resolution of this matter.

Respectfully submitted,


DAMIAN WILLIAMS
United States Attorney

By: _____


Jonathan L. Bodansky
Assistant United States Attorney
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The request is granted. By April 3, 2023, the parties shall make expert disclosures pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G) and 16(b)(1)(C).

SO ORDERED
Date: March 1, 2023
New York, New York


JOHN P. CRONAN
United States District Judge